

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

BABY DOE, *et al.*,

Plaintiffs,

v.

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED STATES SECRETARY OF  
STATE ANTONY BLINKEN, *et al.*,

Nominal Defendants.

Case No. 3:22-cv-49-NKM

DECLARATION OF AHMAD OSMANI  
PURSUANT TO 28 U.S.C. § 1746

Pursuant to 28 U.S.C. § 1746, Ahmad Osmani hereby declares as follows:

1. My name is Ahmad Osmani. I am a defendant named in the above-captioned lawsuit. I am over the age of 18 and competent to testify to the matters stated herein, all of which are based on my personal knowledge. I suffer from no disability that prevents me from making this declaration. All of the statements made herein are true and accurate to the best of my knowledge, information, and belief.
2. I am an immigrant from Afghanistan, where I was born. I immigrated to the United States in June 2021.

**Exhibit A**

3. I live and work in Shelby County, Tennessee, with my family. I previously lived in Madison County, Tennessee. Both of these counties are located in West Tennessee.
4. I have never, in my entire life, lived or worked in the Commonwealth of Virginia. I do not own any property (real or personal) in the Commonwealth of Virginia, and I do not operate any form of business or other such enterprise in the Commonwealth of Virginia.
5. I have never spent a significant amount of time in the Commonwealth of Virginia. The only times I have been in Virginia are as follows:
  - a. To travel to and from Dulles International Airport;
  - b. To testify in legal proceedings currently pending in the Circuit Court of Virginia between the Masts and the Does.
6. On September 7, 2022, I was served with the complaint in this case. I was shocked to see myself named as a defendant and to see the false allegations made against me. Any allegation or suggestion that I have been engaged in any form of conspiracy to abduct the child referred to as Baby Doe is entirely and categorically false.
7. Due to my knowledge of several languages, I served as a language interpreter between the Masts and Does for their conversations, but I did not engage in a conspiracy of any sort with any party. Nor did I aid or abet any abduction of a child.
8. Receiving the complaint caused me a great deal of anxiety and worry. I was supposed to testify in a state court domestic matter later in the week I was served, where I was to be called as a witness by the Masts. The Does and the Masts (Joshua and Stephanie) are opposing parties in that case; Richard Mast is an attorney for the Masts in that case. I believe that this federal lawsuit was meant to intimidate me and influence my testimony.



9. I have suffered other forms of harassment and intimidation from the Does. Previously, one of the Does' state court lawyers contacted me and tried to intimidate me, claiming she had legal authority over me that she did not.
10. My family, including my in-laws, my supervisor and I have also received numerous and repeated inquiries from various reporters. Based on the way these reporters have phrased their questions, I believe they have been given my name and prompted to contact me by the Does, either directly or through their attorneys or other agents. Even when I refer these reporters to my attorney, some of them still contact me personally.
11. All of these actions have caused me and my family great stress and anxiety, and brought my character under question but I am determined to testify truthfully and not be intimidated by anyone.
12. Defending myself in a federal lawsuit in Virginia would be a great and substantial burden for me and my family. I am far from being a wealthy individual, and I must be close to home to help my wife take care of our newborn baby and our other young child. I do not have the financial means to make multiple trips from West Tennessee to Virginia for hearings, depositions, and trial. Any evidence I might have would also be located with me in Tennessee, not in Virginia.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: October 14, 2022

  
Ahmad Osmani